WILMERHALE

August 28, 2018 Timothy Perla

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Honorable P. Kevin Castel United States District Court Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 1007-1312

Re: *In re SunEdison, Inc. Securities Litigation*, S.D.N.Y. Case No. 16-md-02742 (PKC), Request For Leave to Participate in Discovery Conference Telephonically

Dear Judge Castel:

I represent Peter Blackmore, one of the individual defendants in the above-referenced matter. I write regarding the pre-trial conference related to certain discovery matters scheduled for August 29, 2018 at 12:00 P.M. (the "Discovery Conference"). As noted in the D&O Defendants' August 13, 2018 letter, Mr. Blackmore left the SunEdison board on November 20, 2015 and does not believe that he has in his possession any documents implicated by the issues scheduled to be addressed during the Discovery Conference. Further, I am scheduled to be out of state on other business on August 29. I therefore respectfully request leave to participate in the discovery conference telephonically. I am prepared to coordinate with the other counsel participating telephonically to join on the same conference line.

I appreciate your consideration of this matter.

Respectfully submitted,

By: /s/ Timothy J. Perla

Timothy J. Perla

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